

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of,

THE COMMONWEALTH OF PUERTO
RICO, et al.,
Debtors.

PROMESA

Title III

No. 17 BK 3283 – LTS

Re: ECF No. 210, 1016, 2828, 2829, 2940

(Jointly Administered)

FINAL MOTION REQUESTING ADDITIONAL EXTENSION OF TIME

To the Honorable Court:

COMES BEFORE THE COURT DAT@ACCESS COMMUNICATION INC, NETWAVE EQUIPMENT CORP., and NUSTREAM COMMUNICATIONS CORP. (collectively referred to as the “Utility Providers”), utility providers pursuant to the Order (A) Prohibiting Utilities from Altering, Refusing, or Discontinuing Service, (B) Deeming Utilities Adequately Assured of Future Performance, and (C) Establishing Procedures for Determining Adequate Assurance of Payment [ECF No. 1016] (the “Utilities Order”) through the undersigned counsel, and respectfully submits this final motion for entry of an order granting an extension of time to file to comply with the Utilities Order [ECF. No. 1016] and the Amended Schedule of Covered Governmental Agencies and Instrumentalities [ECF. No. 2828] (“Amended Schedule II”).

EXTENSION OF TIME

1. On May 22, 2017, the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”) filed motion petitioning the Court to enter an order prohibiting the Utility providers

from altering refusing or discontinuing services to Debtor, providing assurance for future performance, and establishing the procedures for determining adequate assurance of payment.

2. To that effect, the Honorable Court entered the Utilities Order [ECF No. 1016], granting said motion on August 11, 2017 by which the Honorable Court granted Utility Services Providers an allowed administrative expense claim against Debtor pursuant to Bankruptcy Code sections 503(b) and 507(a)(2), made applicable to Title III cases by PROMESA section 301(a).

3. Said Order also extended to all the Government Agencies and Instrumentalities listed on Schedule 2 of the Utilities Motion, which was attached thereto.

4. On March 29, 2018, AAFAF filed motion which, for all intents and purpose, amended Schedule 2 of the Utilities Motion and Order.

5. On April 20th, 2018, the Utility Providers requested an extension of time of seven days to file an Assurance Request, related to The Utilities Order [ECF. No. 1016] also to comply with [ECF. No. 2940]

6. The Utility providers have identified over 35 contracts and accounts, which we need to file to comply with the Utility Order [ECF. No 1016] and the Schedule II [ECF. No. 2828].

7. We will be filing all these claims and documents necessary to comply with both Utilities Order [ECF. No 1016, 2828.] on Monday.

8. We will start filling on Monday if this Honorable Court grants us this motion. As a final request for an extension of time as we request herein, (supra) until Friday May 4, 2018 to comply fully and file all claims and documents of the Utility Providers, DAT@ACCESS COMMUNICATION INC, NETWAVE EQUIPMENT CORP., and NUSTREAM COMMUNICATIONS CORP.

WHEREFORE, we respectfully request from this Honorable Court that it grants us the extension a final extension of time to comply with the Utilities Order and Amendment [ECF No. 1016, 2828].

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 27th of April of 2018.

I HEREBY CERTIFY that on this same date a true and exact copy of this notice was filed with the Clerk of Court using the CM/ECF system, which will notify all parties in interest.

/S/ HECTOR FIGUEROA VINCENTY
USDC NO.: 120006
CALLE SAN FRANCISCO #310
SUITE 32
SAN JUAN, P.R. 00901
MOBILE: 787-378-1154
QUIEBRAS@ELBUFETEDELPUEBLO.COM